

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC.,  
ALTERNET MEDIA, INC.,  
Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,  
LLC, OPENAI OPCO LLC, OPENAI GLOBAL  
LLC, OAI CORPORATION, LLC, OPENAI  
HOLDINGS, LLC,  
Defendants.

Case No. 1:24-cv-01514-CM-OTW

**NOTICE OF MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE**

Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern Districts of New York, I, Andrew M. Gass, hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendants OpenAI, Inc., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC, (together, “OpenAI”).

I am a member in good standing of the Bar of the State of California, and a certificate of good standing is attached hereto as **Exhibit A**. There are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached the declaration pursuant to Local Rule 1.3.

*[Signature on following page]*

Dated: March 29, 2024  
San Francisco, CA

Respectfully Submitted,

**LATHAM & WATKINS LLP**

/s/ Andrew M. Gass

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